

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PENNSYLVANIA EMPLOYEES BENEFIT
TRUST FUND, on behalf of itself and all others
similarly situated,

Plaintiff,

Civ. No. 05-075-SLR

v.

ZENECA, INC. and ASTRAZENECA
PHARMACEUTICALS, L.P.

Defendants.

(additional case captions appear on next page)

PLAINTIFFS' NOTICE OF FILING OF DISCOVERY PLAN

Pamela S. Tikellis (D.S.B.A. No. 2172)
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DATED: June 21, 2005

LINDA A. WATERS, Commissioner, Offices of Financial and Insurance Services for the State of Michigan in her capacity as Rehabilitator of The Wellness Plan and in her capacity as Liquidator of Michigan Health Maintenance Organization Plans, Inc., formerly known as OmniCare Health Plan, Inc., individually and on behalf of all others similarly situated,

Plaintiff,

No. 05-196-SLR

v.

ASTRAZENECA PHARMACEUTICALS, L.P.
and ZENECA, INC.

Defendants.

JOSEPH MACKEN, on behalf of himself and all others similarly situated,

Plaintiff,

Civ. No. 05-220-SLR

v.

ASTRAZENECA PHARMACEUTICALS, L.P.
and ZENECA, INC.

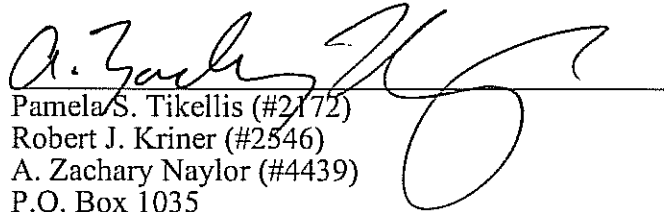
Defendants.

Pursuant to the Court's Order of May 19, 2005, the Plaintiffs attempted to meet with Defendants to confer pursuant to Fed. R. Civ. P. 26(f). Defendants initially refused to do so until the Court denied their motion for a continuance of the scheduling conference. (05-075-SLR D.I. 23)

A meet and confer was then held on June 21, 2005. Plaintiffs hereby submit Plaintiffs' Proposed Discovery Plan in the form found on the Court's website at www.del.us.courts.gov. Plaintiffs have annotated in the Proposed Discovery Plan differences with defendants' proposal.

DATED: June 21, 2005

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